

EXHIBIT 3

July 08, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY,)	Case No. 18-Civ. 12355
individually and as)	
personal representative)	
of the Estate of Keren)	VIRTUAL VIDEOTAPED
Shatsky, J ANNE)	DEPOSITION OF DR. RIYAD
SHATSKY, individually)	MANSOUR
and as personal)	
representative of the)	
Estate of Keren)	
Shatsky, TZIPPORA)	
SHATSKY SCHWARZ, YOSEPH)	
SHATSKY, SARA SHATSKY)	
TZIMMERMAN, MIRIAM)	
SHATSKY, DAVID RAPHAEL)	
SHATSKY, GINETTE LANDO)	
THALER, individually)	
and as personal)	
representative of the)	
Estate of Rachel)	
Thaler, LEOR THALER,)	
ZVI THALER, ISAAC)	
THALER, HILLEL)	
TRATTNER, RONIT)	
TRATTNER, ARON S.)	
TRATTNER, SHELLEY)	
TRATTNER, EFRAT)	
TRATTNER, HADASSA)	
DINER, Yael HILLMAN,)	
STEVEN BRAUN, CHANA)	
FRIEDMAN, ILAN)	
FRIEDMAN, MIRIAM)	
FRIEDMAN, YEHIEL)	
FRIEDMAN, ZVI FRIEDMAN,)	
and BELLA FRIEDMAN,)	

Plaintiffs,

against

July 08, 2021

1 THE PALESTINE
LIBERATION ORGANIZATION
2 and THE PALESTINIAN
AUTHORITY (a/k/a "The
3 Palestinian Interim
Self-Government
4 Authority" and/or "The
Palestinian National
5 Authority"),

6 Defendants.
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1 VIRTUAL VIDEOTAPED DEPOSITION OF DR.

2 RIYAD MANSOUR, a witness herein, called by the
3 Plaintiffs, for examination, taken pursuant to
4 the Federal Rules of Civil Procedure, by and
5 before Karen A. Nickel, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Thursday, July 8,
10 2021, at 9:30 a.m.

11 COUNSEL PRESENT:

12 For the Plaintiffs:

13 Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
14 Cohen & Gresser, LLP
2001 Pennsylvania Avenue, NW
Suite 300
15 Washington, DC 20006

16 Stephen M. Sinaiko, Esq.
Cohen & Gresser, LLP
17 800 Third Avenue
New York, NY 10022

18 For the Defendants:

19 Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
20 Salim Kaddoura, Esq.
Squire Patton Boggs
21 2550 M Street NW
Washington, DC 20037

22 Also Present: Cosette Vincent
23 Eszter Vincze
24
25

July 08, 2021

- - -
I N D E X

WITNESS PAGE

Dr. Mansour

By Mr. Wick 6

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P R O C E E D I N G S

THE VIDEOGRAPHER: Good

morning, everyone. We are now on the record.

Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded unless there is a request and agreement to go off the record.

This is the remote video-recorded deposition of Riyadh Mansour. Today is Thursday, July 8, 2021. The time is now 13:32 UTC time.

We are here in the matter of Shatsky versus PLO. My name is Corey Wainaina, remote video technician on behalf of US Legal Support located at 90 Broad Street, New York, New York.

I am not related to any party in this action, nor am I financially interested in the outcome. At this time, will the reporter, Karen Nickel, on behalf of US Legal Support, please enter the statement for remote proceedings into the record?

THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the

1 deposition room and that I will be reporting
2 this deposition remotely.

3 They further acknowledge that, in
4 lieu of an oath administered in person, the
5 witness will verbally declare his testimony in
6 this matter is under penalty of perjury.

7 The parties and their counsel
8 consent to this arrangement and waive any
9 objections to this manner of reporting. Please
10 indicate your agreement by stating your name
11 and your agreement on the record.

12 MR. WICK: This is Ron Wick,
13 Cohen and Gresser, for the Plaintiffs, and the
14 Plaintiffs agree.

15 MR. BERGER: This is Mitchell
16 Berger for the Defendants, we agree.

17 DR. RIYAD MANSOUR, a witness herein,
18 having been first duly sworn, was examined and
19 testified as follows:

20 EXAMINATION

21 BY MR. WICK:

22 Q. Good morning, Dr. Mansour.

23 A. Hi.

24 Q. I thank you for coming today.

25 A. Welcome.

1 Q. My name is Ron Wick. I represent
2 Plaintiffs in this lawsuit. And let me just
3 ask you off the bat, have you had your
4 deposition taken before?

5 A. Yes.

6 Q. Okay. So you are somewhat familiar
7 with the process but let's just -- I'm going to
8 ask you some questions, of course, but before I
9 do that, I want to go over the process with you
10 so that we are all on the same page. Is that
11 all right?

12 A. Okay.

13 Q. The court reporter will be
14 transcribing everything we say today, so to
15 make sure that the record is accurate, and
16 especially since this deposition is taking
17 place by a video conference, it is important
18 that we not speak over each other, so that only
19 one person speaks at a time.

20 I would ask that you please wait
21 until I finish my questions before you start to
22 answer them, and I will do my very best to wait
23 until you finish your answer before I ask
24 another question.

25 Fair enough?

1 A. I will do my best. Thank you.

2 Q. Okay. It is also important that you
3 respond to my questions verbally. For example,
4 if you shake or nod your head, the court
5 reporter cannot transcribe that answer.

6 A. I understand.

7 Q. If you don't understand a question,
8 please let me know, I will try to rephrase it
9 for you. If you do answer a question, I will
10 assume that you understood. Okay?

11 A. Okay.

12 Q. Your counsel, Mr. Berger,
13 undoubtedly will object to some of my
14 questions. Unless your counsel instructs you
15 not to answer the question, you should go ahead
16 and answer my question even though there was an
17 objection. Is that understood?

18 A. Yes.

19 Q. We will be taking periodic breaks
20 through the deposition. If at any point you
21 need a break, please let me or Mr. Berger know.
22 I will do my best to accommodate your request.

23 The only thing I ask of you is that,
24 if a question is pending, I would ask you
25 answer that question first before we take a

1 break. All right?

2 A. I understand.

3 Q. Are you taking any medication today
4 that would prevent you from answering my
5 questions fully and accurately?

6 A. No.

7 Q. Is there any other reason that you
8 can think of as to why you would not be able to
9 answer my questions today fully and accurately?

10 A. No.

11 Q. Just a few terms I want to go over
12 that I will be using during the course of the
13 deposition and I want to make sure that we are
14 all on the same page.

15 I will be referring, from time to
16 time, to the PA, and by that I mean the
17 Palestinian Authority; is that okay?

18 A. Okay.

19 Q. And I will use the term PLO to refer
20 to the Palestine Liberation Organization;
21 understood?

22 A. Yes.

23 Q. And I may use the shorthand term
24 Observer Mission, by which I mean the Permanent
25 Observer Mission of the State of Palestine to

1 the United Nations; is that all right?

2 A. It is okay.

3 Q. Okay. If we could go to the first
4 tab. I'm going to show you a document,
5 Mr. Mansour.

6 A. Okay.

7 THE VIDEOGRAPHER: Counsel,
8 would you like to see the document and the
9 witness for the video record?

10 MR. WICK: Yes, please.

11 THE VIDEOGRAPHER: Okay.

12 BY MR. WICK:

13 Q. Dr. Mansour, I'm showing you a copy
14 of a Notice that the Plaintiffs in this action,
15 my clients, sent to your counsel regarding your
16 deposition today. Have you seen a copy of this
17 Notice?

18 A. No.

19 Q. I'm sorry?

20 A. No.

21 Q. You have not seen a copy?

22 A. Except now in front of me.

23 Q. Okay. How did you learn that you
24 were being asked to testify at a deposition
25 today?

1 A. By my lawyer.

2 Q. I don't want you to tell me anything
3 that you talked about in that regard with your
4 lawyer. Is it your understanding that you are
5 testifying today pursuant to this Notice of
6 Deposition?

7 A. Yes.

8 Q. Did you do anything to prepare for
9 your deposition?

10 A. Yes.

11 Q. What did you do?

12 A. Met with my lawyer.

13 Q. And was anybody else present when
14 you met with your lawyer?

15 A. No.

16 Q. Did you meet with anybody other than
17 your lawyer to prepare for your deposition?

18 A. No.

19 Q. And did you review any documents in
20 preparing for your deposition?

21 A. I believe that I have seen
22 documents, I understood from my lawyer, that
23 have been provided to you, basically, about my
24 schedule.

25 Q. So you reviewed the calendar

1 documents that were provided to us?

2 A. Yes.

3 Q. Do you -- to the best of your
4 recollection, did you review any other
5 documents in preparation for your deposition
6 today?

7 A. No.

8 Q. And when you said you met with your
9 lawyer to prepare for your deposition, are you
10 referring to Mr. Berger?

11 A. Yes.

12 Q. Did you meet with any other lawyers?

13 A. Early in the process, yes, but the
14 -- for this deposition is with Mitch.

15 Q. By "early in the process," do you
16 mean at the beginning of the lawsuit?

17 A. No. When we were approached to make
18 deposition.

19 Q. And, approximately, how long ago was
20 that?

21 A. A month, month and a half ago.

22 Q. And at that time, who did you meet
23 with?

24 A. I think Mitch can -- I don't
25 remember the names, Mitch can remember them.

1 One, Baloul, I think, I believe, his last name.

2 The other one I don't remember.

3 Q. Mr. Baloul?

4 A. Yes.

5 Q. And there was another attorney as
6 well?

7 A. Yes.

8 Q. Was it Mr. Alonzo?

9 A. I don't remember the name.

10 Q. Fair enough. And when you reviewed
11 your calendar entries that were provided to us
12 in preparing for your deposition, did those
13 documents refresh your memory at all as to any
14 events?

15 A. Yes.

16 Q. Specifically, did they refresh your
17 memory as to the events in question on the
18 calendar?

19 A. Calendar is very basic as to
20 hundreds of meetings. So it refreshed my
21 memory as to which meeting, with whom, so that
22 I remember, you know, these sort of -- to
23 refresh my memory about these things, yes.

24 Q. And did you bring any documents with
25 you to the deposition today?

1 A. No. Other than the two documents
2 that I have here.

3 Q. What are the two documents that you
4 have there?

5 A. These two documents. This one, this
6 one.

7 Q. Okay. It appears to me that you are
8 showing me the copy of your calendar entries
9 and a copy of the Defendants' revised privilege
10 log?

11 A. Yes.

12 Q. Is that correct?

13 A. Yes.

14 Q. Okay. I would like to just step
15 back for just a moment and do a quick
16 housekeeping measure. I understand that
17 Ms. Nickel is in Pennsylvania. Dr. Mansour,
18 where are you today?

19 A. In my office in New York, 115 East
20 65th Street, New York, New York.

21 Q. So you are in the Observer Mission
22 building?

23 A. Yes.

24 MR. WICK: I just want to be
25 clear that we are all in agreement, per Rule 29

**THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED**

July 08, 2021

1 MR. BERGER: Ron, I really
2 don't know what you mean by "the general
3 nature." You have asked a question about
4 whether something is a staff meeting. That is
5 perfectly acceptable to us. If you are asking
6 about what the topics were that were discussed
7 at the staff meeting, that is covered by
8 functional immunity.

9 BY MR. WICK:

10 Q. I'm going move down to the, about
11 two-thirds of the way down that first page,
12 there is an entry dated February 2, 2020 and
13 the subject line is interactions with civil
14 society organization Beit Hanina Cultural
15 Center Brooklyn on UN topics. Do you see that
16 entry?

17 A. Yes.

18 Q. Where did that event take place?

19 A. In Brooklyn.

20 Q. I apologize if I am mispronouncing
21 this. What is the Beit Hanina Cultural Center?

22 A. Civil society organization.

23 Q. What do you mean by a civil society
24 organization?

25 A. It is a civil society organization

1 of the community, Palestinian-Americans, who
2 were originally from Beit Hanina, which is a
3 neighborhood in Jerusalem, who are residing in
4 Brooklyn.

5 Q. And what is the purpose of the
6 organization?

7 A. I don't really know. You have to
8 ask, you know, the organizers of this
9 organization. They are better qualified --

10 Q. To your knowledge, does the Beit
11 Hanina Cultural Center have any connection to
12 the United Nations?

13 A. So the work of the United Nations,
14 many people might not know that it is not only
15 diplomats, it is diplomats' involvement of
16 civil society organization, involvement of the
17 media, involvement of the missions, involvement
18 of parliamentarians, involvement of so many
19 sectors of different societies, because the way
20 the UN operates, it invites so many different
21 representations of different societies and
22 countries that participate in the decision
23 making process.

24 So, therefore, there are hundreds,
25 maybe more than hundreds, civil society

1 organizations that are accredited to the United
2 Nations or --

3 THE COURT REPORTER: Excuse
4 me, please.

5 The videographer, is there some way
6 of correcting the audio between the witness and
7 Mr. Berger because I'm having trouble with the
8 witness cutting out and then Mr. Berger, when
9 he speaks, there is a lot of echoing on my end.

10 THE VIDEOGRAPHER: We are now
11 off the record. The time is 14:31 UTC time.

12 (Discussion held off the
13 record.)

14 THE VIDEOGRAPHER: We are
15 back on the record. The time is 14:36 UTC
16 time.

17 BY MR. WICK:

18 Q. Dr. Mansour, before we had to go off
19 the record, you were in the middle of an answer
20 to my question. I had asked you whether the
21 Beit Hanina Cultural Center had any connection
22 to the United Nations and you were explaining
23 that the United Nations involves multiple
24 organizations.

25 Is there anything more that you

1 wanted to say?

2 A. No. Just, basically, I was saying
3 the nature of work at the United Nations, it is
4 so encompassing and exclusive that it allows
5 for participation in the decisionmaking process
6 to so many different players; representatives
7 of countries, representatives of multicultural
8 organizations, civil society organizations,
9 media, parliamentarians, all components of
10 society because the agenda of the UN, it
11 involves humanity in so many different ways.

12 I will give an example. For
13 example, when we debate climate change, that is
14 not only the domain of diplomats, it is civil
15 society admissions, activists, private sectors,
16 all of them, they have a stake on this issue.

17 And the UN and the Secretary General
18 and the General Assembly invite all those to
19 contribute to that collective effort of all of
20 us of how we view these issues and what we
21 legislate.

22 So, therefore, everybody has
23 something to contribute. So in this example,
24 this civil society organization, the
25 Palestinian-Americans, they feel that they have

1 a role to influence those who are dealing with
2 the question of Palestine at the UN with
3 whatever they have in their mind.

4 Q. Does the Beit Hanina Cultural Center
5 have any accreditation from the United Nations?

6 A. As far as I know, I don't really
7 know. They may, they may not. I will just
8 give an example. There are hundreds who are
9 accredited civil society organizations. Some
10 of them are Palestinian, some of them are
11 Palestinian-American. Many of them are
12 Jewish-American organization or Israeli
13 organization.

14 Some of them, they go through the
15 scrutiny of the Social and Economic Council to
16 approve them as accredited civil society
17 organization, who may be on the Exercise of the
18 Inalienable Rights has its own mechanism of
19 accrediting civil society organization, and
20 there are hundreds of them that are accredited
21 by that group. I am just giving you an example
22 how things are at the United Nations, not only
23 diplomats operating in a vacuum. We operate
24 within the dynamics of what is happening, all
25 of us.

1 Q. I understand that. To be clear, you
2 don't know whether the Beit Hanina Cultural
3 Center is accredited by the United Nations;
4 correct?

5 A. I don't know.

6 Q. And what does it mean for a civil
7 society organization to be accredited by the
8 United Nations?

9 A. To be invited --

10 THE COURT REPORTER: I'm
11 sorry, I did not hear the ending.

12 THE WITNESS: To be
13 accredited, to be invited to events. For
14 example, if you are an accredited women
15 organization, there are so many conferences and
16 events related to the rights of women. So then
17 if you are accredited, you will be invited, you
18 will listen to debates, you can contribute to
19 debates, you can lobby for certain kind of
20 resolutions and you are allowed to vote on
21 these things, as an example.

22 MR. WICK: Let me put up Tab
23 16, please. I am going to ask that this
24 document be marked as next in order, I believe
25 Exhibit 5.

**THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED**

1 A. No.

2 Q. Did he have any connection to the
3 United Nations at the time of this interaction?

4 A. I think that, in general, everything
5 that he does is related to the work of the
6 United Nations, particularly in the legal
7 field, in the international criminal court, and
8 the international court of justice. He is
9 highly involved in all these issues, or key
10 components of the work of the --

11 Q. But you're not aware of any formal
12 position or connection or accreditation between
13 Ardi and the United Nations as of the time of
14 this meeting; correct?

15 A. I don't know. I don't have any
16 knowledge.

17 Q. Where did this event take place?

18 A. I believe it is Zoom, because it's
19 Ramallah, New York. Michael Lynk is either in
20 Geneva or Canada, the same thing with Ardi.

21 Q. And where were you at the time of
22 the meeting?

23 A. Most likely in my office.

24 Q. And what was the substance of this
25 meeting?

1 A. Legal issues.

2 Q. Legal issue?

3 A. Legal issues, not one issue.

4 Q. Okay. Which legal issues?

5 I'm sorry, did you hear my question,
6 Dr. Mansour?

7 A. I did, I heard what -- Mitch is
8 advising me.

9 MR. WICK: If Mr. Berger is
10 speaking, we can't hear him.

11 MR. BERGER: I'm on double
12 mute. I thought I had my phone -- was off
13 mute, but my computer is on mute. I said I
14 object on grounds of functional immunity and
15 instruct the witness not to answer, because you
16 are getting into the substance of a meeting for
17 which we claim functional immunity.

18 MR. WICK: Even though the
19 witness has testified that there was an
20 individual present who has no known connection
21 or relationship with the United Nations?

22 MR. BERGER: Yes. As we
23 explained to you in a letter I sent to you
24 yesterday, functional immunity does not turn on
25 the presence or absence of somebody not with

1 the United Nations.

2 It turns, according to the UN
3 Secretariat, on whether the meeting occurred in
4 the exercise of the Observer's function. His
5 testimony confirms it did. So it's, therefore,
6 covered by functional immunity.

7 BY MR. WICK:

8 Q. Scroll down two more pages, please.
9 There is, about seven lines down, there is a
10 notation on November 24, 2020, interaction with
11 civil society organization Israa University on
12 UN topics.

13 Do you see that?

14 A. Yes.

15 Q. And where did that event take place?

16 A. It's a virtual event. I was in my
17 office, and Israa University is one of the
18 Palestine universities in the Gaza Strip.

19 Q. Was the event virtual?

20 A. Yes.

21 Q. And you were in your office in the
22 Observer Mission?

23 A. Yes.

24 Q. And what type of interaction was
25 this; was it a speech?

1 A. Yes, speech and questions and
2 answers.

3 Q. And was that speech open to the
4 public?

5 A. I don't know what they did in the
6 Gaza Strip. I just was speaking through, you
7 know, Zoom to a group of people, individuals
8 that appeared on -- as we are communicating.

9 Q. So you have no knowledge as to
10 whether or not the event was public or not
11 public?

12 A. I think it was a course, graduate
13 course related to media and UN issues related
14 to the question of Palestine.

15 Q. So were you a guest lecturer in the
16 class?

17 A. You can say that, yes.

18 Q. And were you compensated for that?

19 A. No.

20 Q. And to your knowledge, does Israa
21 University have any connection to the United
22 Nations?

23 A. I don't really know the connection
24 of that university but academia, in general,
25 are extremely interested in the UN. Many

1 universities, as you probably know, have UN
2 Model organizations teach students about the
3 work of the UN, agenda of the UN, and many
4 student groups, they like to represent in the
5 General Assembly format or Security Council
6 format, different countries. Very often when
7 they approach us, they want to represent
8 Palestine in these training sessions for
9 students.

10 Therefore, they ask us about all
11 kind of questions, what we do at the UN, the
12 topic, how we discuss them, so that they can
13 emulate representation of the State of
14 Palestine in their UN models.

15 Q. By the way, there are a number of
16 entries on the privilege log that use the
17 letters PR. For example, two lines above the
18 Israa University entry, it states, interaction
19 with PR of Norway.

20 Do you see that?

21 A. Yes.

22 Q. What does PR stand for?

23 A. Permanent Representative. And you
24 know what my abbreviation is, PO.

25 Q. No.

1 A. PO.

2 Q. For Permanent Observer?

3 A. Yes.

4 Q. Go over to the next page. Three
5 lines from the bottom, there is a note,
6 interaction with civil society organization
7 Coalition of Palestinian American Organizations
8 on UN topics. Again, February 28, 2021.

9 Do you see that?

10 A. Yes.

11 Q. And where did that event take place?

12 A. It was a Zoom event.

13 Q. And where were you during that
14 event?

15 A. In my office.

16 Q. In your office where you are now?

17 A. Yes.

18 Q. And were you giving a speech?

19 A. No. I was just listening because
20 the speaker was our Prime Minister,
21 Dr. Shtayyeh.

22 Q. Okay. And does, to your knowledge,
23 the Coalition of Palestinian American
24 Organizations have any connection to the United
25 Nations?

1 A. They might be accredited to the
2 United Nations.

3 Q. You have no knowledge as to whether
4 they are or they are not accredited?

5 A. No, I don't.

6 Q. And was the Prime Minister
7 discussing UN topics?

8 A. Everything is related to the UN when
9 you talk about peace, classes, two-state
10 solution, under the auspices of the United
11 Nation, the involvement of the Security
12 Council, in terms of reference to international
13 law and relevant --

14 THE COURT REPORTER: I'm
15 sorry, Doctor, you cut out again.

16 THE WITNESS: I said that in
17 his reference to the peace process, a just
18 solution to the conflict is the convening of
19 international peace conference under the
20 auspices of the Security Council, the
21 involvement of the Quartet of Peace in the
22 Middle East, under the banner of international
23 law and relevant UN resolutions, all these
24 things are issues related to United Nations.

25 BY MR. WICK:

1 Q. So in your view, any discussion of
2 peace in the Middle East is a UN topic?

3 A. At the UN, it is a UN topic. Peace
4 in the Middle East is a UN topic. It's a big
5 UN topic.

6 Q. Is climate change a UN topic?

7 A. Climate change is a UN topic, a big
8 UN topic.

9 Q. Is women's rights a UN topic?

10 A. Absolutely.

11 Q. So would it -- so it is your view
12 that any event that you attend that discusses
13 climate change or women's rights is official UN
14 business?

15 A. Yes. And I can add, for example,
16 climate change, we are a state party as the
17 State of Palestine to the climate change
18 convention. So we participate as equal with
19 all states as parties to the climate change
20 conference and the Paris Agreement on climate
21 change. We are equal.

22 The same thing, we are a party, as a
23 state party to so many conventions related to
24 the rights of women. They are equal with
25 everyone else. So we discuss these issues in

1 the general term and in the specific term as
2 related to Palestine.

3 It is like everybody else, we are
4 not different than anybody else. This is how
5 we do business at the UN.

6 Q. Can you think of any topic that is
7 not official UN -- that is not official UN
8 business in your view?

9 A. I am so busy in being submerged on
10 those, so many issues on the agenda of the UN
11 to the point that I don't think of other
12 issues.

13 Q. Would you consider the use of
14 plastics to be a UN topic?

15 A. In fact, it is. And I attended a
16 conference and event in one of the Caribbean
17 states with other officials, the Prime Minister
18 of that state, and normalizing for eliminating
19 plastic as a polluter against humanity and
20 affecting us in the negative way and polluters
21 of oceans and, you know, we were part of the
22 efforts to normalize humanity against plastic
23 things because they are, you know, negatively
24 affecting our environment.

25 And if you pass by the United

1 Nations, you will see big signs on the wall of
2 the United Nations for the public to see how
3 plastic is bad and eliminate plastic from use.

4 Q. So if you speak to an organization
5 at a non-public event about the use of
6 plastics, you would consider that part of your
7 organization's functional immunity?

8 A. If they invite me on my capacity as
9 Permanent Observer, Ambassador of the State of
10 Palestine, and in my capacity as a previous
11 chair of the Group of 77 and China, speak about
12 plastic and its negative effect on our
13 environment, that is within my exclusive domain
14 in exercising my authority as observership
15 activities as the Observer of the --

16 Q. Let's go to the next page, please.
17 On the next page, there is, about a third of
18 the way down, there's an entry dated March 26,
19 2021, interactions with civil society
20 organization church group on UN topics.

21 Do you see that?

22 A. March 20 what?

23 Q. 6.

24 A. 26. Yes.

25 Q. And where did that event take place?

1 A. It was virtual for a church group in
2 Orlando, Florida.

3 Q. Were you in your office at the
4 Observer Mission at the time?

5 A. Yes.

6 Q. What was the name of the church
7 group?

8 A. My wife belongs to that group. I
9 cannot remember now the name, but it's a group
10 that she belongs to in Orlando, Florida.

11 Q. What was the nature of the group?

12 A. They are a group that work for peace
13 and justice in the Middle East.

14 Q. Okay. And does your wife's church
15 have any connection to the United Nations?

16 A. No, it doesn't. But I can, again,
17 tell you that faith-based organizations, almost
18 all churches in the United States and
19 worldwide, have Observers at the United
20 Nations. There is a building across the street
21 from the United Nations where there are so many
22 representatives from these different churches,
23 they represent them in the works of the General
24 Assembly, and they are a key player in so many
25 global issues in the agenda of the UN.

**THESE PAGES HAVE BEEN
INTENTIONALLY OMITTED**

1 Q. Go to the next page. On June 30,
2 2020, middle of the page, there is an entry, it
3 simply says, interview (Zoom).

4 Do you see that?

5 A. Yes.

6 Q. And what was that event?

7 A. Most likely is, you know, a media
8 interview.

9 Q. Who was the media interview with?

10 A. I don't remember. It could be, you
11 know, the one after it. I don't really know,
12 to be precise.

13 Q. Okay. The next entry, which you
14 just referenced, is July 1, 2020. It says,
15 interview with TRT Arabic with Nihal. What
16 does that entry signify?

17 A. This is an interview that was done
18 from the TRT office in London, England.

19 Q. Was that done virtually?

20 A. Yes.

21 Q. And where were you?

22 A. In the office, as far as I remember.

23 Q. In your office at the Observer
24 Mission?

25 A. Yes.

1 Q. Then, on July 14, 2020, there is an
2 entry, virtual informal meeting of the General
3 Committee.

4 Do you see that?

5 A. Yes.

6 Q. What is the General Committee?

7 A. The General Committee is a committee
8 of the General Assembly in which it deals with
9 the adoption of the agenda of the United
10 Nations. If any country wants to introduce a
11 new item on the agenda, they go to the General
12 Committee.

13 If the General Committee approves
14 the addition of that item, then the General
15 Assembly decides where to allocate that item,
16 whether in the General Assembly directly or one
17 of the major committees of the General
18 Assembly.

19 It relates to subject matter. If it
20 is an economic issue, they might decide to put
21 it on the agenda of the second. If it is a
22 disarmament issue, then they will put it in the
23 first. If it is a legal issue, they will put
24 it in the second, so that the General
25 Committee, that is the function of the General

1 Committee, to deal with the agenda of the
2 General Assembly.

3 Q. And that meeting relates to UN
4 business; correct?

5 A. Pardon me?

6 Q. That meeting related to United
7 Nations business; correct?

8 A. Absolutely.

9 Q. And you participated in that meeting
10 in your official capacity; correct?

11 A. I don't remember whether I went or I
12 had somebody else representing me there, but we
13 have, on the agenda of the United Nations, many
14 items related to us. So, therefore, we have
15 interest in the General Committee, yes.

16 Q. So you are not sure whether you
17 attended this meeting or not?

18 A. I'm not sure.

19 Q. Okay. Was this a non-public
20 meeting?

21 A. It is most likely a non-public
22 meeting, yes.

23 Q. And if you attended it, it would
24 have been in your official capacity as an
25 Observer --

1 A. Absolutely.

2 Q. And is there any reason in your mind
3 why the substance of that meeting wouldn't be
4 subject to functional immunity or privilege?

5 A. Can you repeat the question?

6 Q. Sure. Do you know of any reason why
7 the substance of this non-public meeting that
8 you attended in your official capacity as
9 Permanent Observer, that involved UN topics,
10 would not be privileged or subject to
11 functional immunity as some of the other items
12 we discussed were?

13 A. That meeting, definitely, everyone
14 who attended of the member states or Observer
15 states as in our case, is -- it applies to --
16 it is applies exactly to the General Assembly,
17 meaning all of us would be covered, you know,
18 under our headquarters agreement with United
19 States of America and the United Nations. All
20 of us would have immunity in that meeting
21 because it is in the United Nations --

22 Q. Do you know of any reason why this
23 item wasn't included on the privilege log?

24 A. No, I don't.

25 MR. BERGER: I can address

1 that and I want to put that on the record,
2 which is the very cover page of the calendar
3 says that it is subject to claims of functional
4 immunity and jurisdictional immunity. We put
5 it in the public calendar because it's listed
6 as a public event in the UN's public calendar.

7 MR. WICK: Thank you,
8 Mr. Berger.

9 BY MR. WICK:

10 Q. Let's go to the next page. There is
11 an entry, not quite halfway down, October 22,
12 2020, titled Zoom meeting with ADC. Do you see
13 that?

14 A. Yes.

15 Q. And do you know what that entry is
16 for?

17 A. Yes.

18 Q. What was that event?

19 A. It was an event with ADC, which is
20 an accredited organization to the United
21 Nations, the Anti-Discrimination Committee,
22 about, you know, our work at the UN and
23 discussions with those who participated from
24 their side on this event. They invited me in
25 my official capacity as the Ambassador of the

1 State of Palestine, Permanent Observer to the
2 State of Palestine to the United Nations.

3 Q. We are going to show you a video
4 that we will have marked as Exhibit 7, please.

5 (Deposition Exhibit No. 7 was
6 marked for identification.)

7 (Video playing.)

8 BY MR. WICK:

9 Q. Dr. Mansour, do you recognize that
10 as a video of the ADC meeting described in your
11 October 22, 2020 calendar entry?

12 A. Yes.

13 Q. And where were you when you appeared
14 at --

15 A. In this office.

16 Q. At your office at the Observer
17 Mission?

18 A. Yes.

19 Q. We can go back to the calendar.
20 What was the purpose of your appearance at the
21 ADC event, Dr. Mansour?

22 A. It's, you know, talking about what
23 we do at the United Nations, and whatever
24 questions that they have related to our work,
25 at that time, from the point of view of their

1 audience or those who are participating in that
2 event.

3 Q. Was one of those purposes to
4 advocate for the Palestinian cause?

5 A. I was invited in my capacity as the
6 Ambassador of the State of Palestine to the
7 United Nations, and it is my duty to exercise
8 my observership capacities at the United
9 Nations.

10 So it is within that context, I was
11 invited, and within that context, I shared with
12 them our view and vision.

13 Q. I'm going to ask the question again
14 because I don't think that I got a clear
15 answer.

16 Was one of your purposes in speaking
17 to the ADC to advocate for the Palestinian
18 cause?

19 A. I always advocate to the Palestinian
20 cause in my capacity as the Ambassador of the
21 State of Palestine to the United Nations in
22 carrying out my, and exercising my functions
23 and responsibilities as an Observer of the
24 United Nations.

25 Q. Just a moment, please. In the case

1 of the October 22, 2020 meeting, you were
2 advocating for the Palestinian cause to the
3 American Arab Anti-Discrimination Committee;
4 correct?

5 A. I was advocating in my capacity and
6 in my responsibility for those who were under
7 the other end of the Zoom.

8 Q. And that was members of the ADC;
9 correct?

10 A. I assume so. I don't know if they
11 are members or what.

12 Q. There is another entry on November
13 14, 2020, speak at the first convention of Beit
14 Sahour?

15 A. Sahour. Beit Sahour.

16 Q. Beit Sahour.

17 A. Yes.

18 Q. And what was that event?

19 A. This is another civil society
20 organization for Palestinian-Americans. I
21 believe it's in Michigan. And then they were
22 organizing themselves, building an
23 organization, and they invited me, in my
24 capacity as the Ambassador of the State of
25 Palestine to the United Nations, to say a few

1 words of congratulating them on the occasion of
2 their convention, and I shared with them what
3 we do at the United Nations.

4 Q. And we have another video to show
5 you, which we would like to mark as Exhibit 8.

6 (Deposition Exhibit No. 8 was
7 marked for identification.)

8 (Video playing.)

9 BY MR. WICK:

10 Q. Dr. Mansour, do you recognize that
11 as a video of the speech described on your
12 November 14, 2020 calendar entry?

13 A. Yes.

14 Q. And you gave that speech virtually;
15 correct?

16 A. That is correct.

17 Q. And where were you when you gave the
18 speech?

19 A. In this office here.

20 Q. At the Observer Mission building?

21 A. That is correct.

22 MR. BERGER: May I please ask
23 for clarification of the record, which is,
24 you're showing very short clips of maybe eight
25 or ten seconds. When you're asking if he

1 recognizes them, I assume you're asking him if
2 he recognizes only the clips you're showing
3 him, because we haven't seen anything more than
4 that; is that correct?

5 MR. WICK: That is correct. I
6 am asking if he recognizes it as an excerpt
7 from the video.

8 MR. BERGER: But you are not
9 asking if he recognizes the remainder of the
10 video that you weren't showing him because you
11 haven't shown it to him and given him an
12 opportunity to comment on it. So I just want
13 to be clear, for the record, that his answers
14 are -- you're asking for answers that address
15 the short clips you're showing him. Yes?

16 MR. WICK: I am not clear on
17 your question, Mr. Berger. The video is the
18 video.

19 MR. BERGER: Let me be clear
20 so we can avoid some kind of trap later on. If
21 you are planning on using portions of the video
22 that you haven't shown him later on in these
23 proceedings, then it's your obligation to show
24 him the entirety of the video rather than just
25 show clips.

1 Otherwise, we object on foundational
2 grounds to use of anything other than the clips
3 you have shown him to which he has answered.

4 MR. WICK: Fair enough. We'll
5 come back to that.

6 BY MR. WICK:

7 Q. Let's go to entry November 16, 2020,
8 interview from Cairo. What was that event?

9 A. What is the date?

10 Q. November 16, 2020.

11 A. This is a radio interview for media
12 from Cairo. I did it over the phone.

13 Q. And where were you when you gave the
14 interview?

15 A. I don't really know. Sometimes I do
16 these things while I'm in the car.

17 Q. Were you in the United States?

18 A. Yes.

19 Q. I would like to back up very quickly
20 to the last event we discussed, the Beit Sahour
21 speech. Was one of your purposes in giving
22 that speech to advocate for the Palestinian
23 cause?

24 A. They approached me and they said
25 that they are an establishment organization,

1 and they want, just to say -- they invited me
2 in my capacity as the Ambassador of the State
3 of Palestine for the United Nations, and I
4 obliged them.

5 Q. And was one of the reasons that you
6 accepted the invitation and spoke to that group
7 to advocate for the Palestinian cause?

8 A. Everything that I do in my capacity
9 for the UN is advocating for the Palestinian
10 cause.

11 Q. There is an entry on November 19,
12 2020 titled Seton Hall University virtual talk.
13 What does that entry signify?

14 A. Yes. What date is that? November.
15 Again, I was invited and it was done virtually
16 through Speche, if I am not mistaken, it might
17 be the political science department or
18 something to do with international law, Seton
19 Hall University.

20 Again, academia and universities are
21 key components of the work of the United
22 Nations. I talk about Model UN on part of it
23 and the other part, what they teach, they
24 teach, you know, concrete issues.

25 I was a teacher and I used to teach

1 issues related to the agenda of the UN, and
2 they wanted to know what we do at the United
3 Nations in trying to find a peaceful solution
4 to this conflict.

5 I obliged them and I spoke on that
6 subject related to my work at the UN.

7 Q. All right. We would like to show
8 you another video which we will mark Exhibit 9,
9 an excerpt from a video.

10 (Deposition Exhibit No. 9 was
11 marked for identification.)

12 (Video playing.)

13 BY MR. WICK:

14 Q. Dr. Mansour, do you recognize that
15 excerpt as an excerpt from a video of the talk
16 described in your November 19, 2020 calendar
17 entry?

18 A. I do.

19 Q. Was that a talk given to university
20 students or college students in the United
21 States?

22 A. Yes.

23 Q. And where were you when you gave the
24 talk?

25 A. In my office in the Observer Mission

1 of the State of Palestine, United Nations.

2 Q. And was one of the purposes of
3 accepting that invitation and giving that talk
4 to advocate for the Palestinian cause?

5 A. As I said before, when I am invited
6 in my capacity as the Observer, Ambassador of
7 the State of Palestine for the United Nations,
8 I, you know, speak in that capacity on the
9 advancing the cause of the Palestinians and
10 United Nations.

11 Q. The next entry is November 23, 2020
12 -- not the next entry -- well, it is the next
13 entry. It states, bureau meeting. Do you see
14 that entry?

15 A. Yes.

16 Q. Do you know what that means?

17 A. Yes.

18 Q. What is the bureau being referred
19 to?

20 A. It is the Bureau of Committee on the
21 Exercise of the Inalienable Rights of the
22 Palestinian People, it is a General Assembly
23 committee.

24 Q. Last item on the page, December 10,
25 2020, titled, all I want for Christmas is a

1 stronger multilateral system.

2 Do you know what that event was?

3 A. That was a nice event. There are
4 global Ambassadors, they would discuss -- well,
5 let me, first of all, yes, I know. That is
6 your question.

7 Q. Okay. What was the event?

8 A. As I said, you know, global
9 Ambassadors that, you know, they dialogue and
10 discuss defending multilateralism, which
11 embodiment of that is United Nations, because
12 there was a threat against multilateralism from
13 certain quarters during the few years before
14 that date, threatening multilateralism so that
15 those group of Ambassadors were brainstorming
16 about the ways and means of how to protecting
17 and ending and what it stands for as an example
18 of multilateralism. And since that event was
19 so close to Christmas, then, you know the title
20 of it is All I Want for Christmas is a Stronger
21 Multilateral System.

22 Q. So I'm not clear, what was the
23 event, was it a panel discussion or a speech,
24 for example? What is the event?

25 A. It is a brainstorming on a Zoom

1 session among a number of Ambassadors.

2 Q. Can we go to the next page, please,
3 the one after that. There are two entries
4 midway down the page from March 17, 2021 and
5 then one two lines below it on March 18, 2021
6 titled, Invitation to the Fifth Retreat of the
7 Friends of Monterrey. Do you see that?

8 A. Yes.

9 Q. And was that an event that you
10 attended?

11 A. No. I did not attend that.

12 Q. Did anyone attend from the Observer
13 Mission in your place?

14 A. Yes. I asked one of my colleagues
15 to attend.

16 Q. And who attended?

17 A. The person who is in charge of
18 issues related to development.

19 Q. And what is that person's name?

20 A. Abdallah.

21 Q. Is that a first name or a last name?

22 A. Abdallah Abushawesh.

23 Q. Okay. And what is the Friends of
24 Monterrey?

25 A. One of the key issues that was under

1 consideration for a long period of time at the
2 UN is the concept of finance for development.
3 First conference of finance for development
4 took place in Monterrey, Mexico, and every five
5 years, a continuation of the same concepts, the
6 need to organize similar conferences. One, the
7 second one, I believe Dor in Hefa (phonetic),
8 and another one, Addis Ababa in Ethiopia.

9 So the Mexican Ambassador, because
10 this is the beginning of a very key component
11 of the developmental agenda at the United
12 Nations, which it is evaded and discussed
13 heavily in the second committee and also in the
14 SDGs, the sustainable development goals, and
15 they form a Friends of Monterrey to keep the
16 principals of Monterrey on finance for
17 development alive.

18 Before the COVID, they used to
19 invite a number of friends to go and meet in
20 Monterrey, Mexico, over two days, discussing
21 and debating issues related to finance for
22 development.

23 But because of the COVID, this was
24 done virtually. So that's what this is all
25 about. Very, very important pillar of our

1 discussion in the economic and developmental
2 team of the UN is we finance for development
3 and the founding place for this concept was in
4 Monterrey, Mexico.

5 Q. Is the Friends of Monterrey
6 affiliated with the UN?

7 A. Yes. Of course.

8 Q. How so?

9 A. As I said, you know, that if you
10 look at the SDGs 17 Goal and the 169 targets,
11 finance for development is a very important
12 concept for eradication of poverty, for better
13 educational system for humanity, rights of
14 women, climate change and the rest of all of
15 the goals and targets, finance for development
16 is a key component for the implementation of
17 SDGs, which it is the SDGs, and implementing
18 them by 2030 is like, you know, the human
19 rights, you know, elements agenda of human
20 rights.

21 So that is one of the pillars of the
22 thinking of the United Nations in the --

23 Q. Other than the fact that the Friends
24 of Monterrey and the United Nations are both
25 interested in finance for development, is there

1 any affiliation between the two organizations?

2 A. You mean the UN in finance and
3 development?

4 Q. I mean the UN and Friends of
5 Monterrey.

6 A. When the Monterrey conference was
7 convened, it was a line conference.

8 Q. And Abdallah Abushawesh attended
9 virtually?

10 A. I believe so.

11 Q. Do you know where he was when he
12 attended?

13 A. I believe, most likely, in his
14 house.

15 Q. Where is his house?

16 A. Queens.

17 Q. Queens?

18 A. Yes.

19 Q. And to be clear, the topic discussed
20 at the fifth Retreat of the Friends of
21 Monterrey were UN topics?

22 A. Absolutely.

23 Q. Next item I would like to ask about
24 is April 6, 2021 Palestinian affairs and the
25 Biden administration, status quo versus

1 political engagement, Dr. Riyadh Mansour,
2 Permanent Observer of the State of Palestine to
3 the United Nations.

4 Do you see that?

5 A. I see it.

6 Q. Do you know what that entry is or
7 what it signifies?

8 A. Is this the university -- Biden
9 administration -- if it is a university,
10 Bridgewater University, then this is a lecture
11 -- a discussion at that institution.

12 Q. You believe this is a speech you
13 gave to Bridgewater State University?

14 A. It could be, yes. I don't remember
15 exactly, but I have a feeling that it might be
16 that.

17 Q. Would this be a different speech to
18 Bridgewater State University than the one that
19 we talked about before on your privilege log?

20 A. We did not talk about the
21 Bridgewater University yet.

22 Q. Do you recall, a little while ago
23 when we talked about an entry on your privilege
24 log that referred to Boston College, and you
25 indicated you believe that that actually was a

1 Bridgewater State event?

2 A. I don't know if it was on that day.
3 I remember, for that university, dates changed
4 more than one time, and it could be that
5 function on April 6, not on that date
6 previously.

7 Q. Okay. I would like to show you a
8 video that we would like to have marked as
9 Exhibit 10.

10 (Deposition Exhibit No. 10 was
11 marked for identification.)

12 (Video playing.)

13 BY MR. WICK:

14 Q. Dr. Mansour, do you recognize that
15 as an excerpt from a video of, or a speech to
16 Bridgewater State University as reflected in
17 your calendar entry?

18 A. Yes.

19 Q. This is the April 6, 2021 entry that
20 we have been discussing, Palestinian affairs
21 and the Biden administration?

22 A. I believe so.

23 Q. And you were speaking to U.S.
24 college students in that speech; correct?

25 A. And professors.

1 Q. And professors. And where were you
2 when you gave the presentation?

3 A. My office at the Observer Mission of
4 the State of Palestine, United Nations.

5 Q. And was one of the purposes of that
6 speech to advocate for the Palestinian cause?

7 A. Again, as I said, you know,
8 universities are a key component of the
9 decisionmaking process at the United Nations.
10 And universities also have programs, study
11 issues on the agenda of the UN, including the
12 question of Palestine.

13 So when they invite me, they invite
14 me in that capacity, and they ask me questions
15 as it relates to their education, to their
16 students, about how the United Nations is with
17 the Palestine question.

18 Q. And was one of the purposes of that
19 speech to advocate for the Palestinian cause to
20 those students and professors?

21 A. Again, as I said, everything that I
22 do in my capacity as Permanent Observer of the
23 State of Palestine to the United Nations is to
24 advocate for justice for the Palestinians on
25 the basis of the UN charter and UN

1 resolutions --

2 THE COURT REPORTER: I'm
3 sorry, Doctor, you cut out again at the end.

4 THE WITNESS: At the end, I
5 said that on the basis of international law and
6 relevant UN resolutions.

7 BY MR. WICK:

8 Q. On -- the next item I would like to
9 ask about is May, the very bottom, May 6, 2021,
10 informal active dialogues with the candidates.
11 And if we scroll to the next page, you will see
12 an identical entry for May 7, 2021.

13 Do you see those two entries?

14 A. Yes.

15 Q. What was that event?

16 A. You know, another aspect of the work
17 of the United Nations. Many countries run for
18 offices. For example, every year we have five
19 countries running for seats in the Security
20 Council. So the candidates, they lobby
21 countries or groups so that they can get their
22 votes and to win a seat in the Security
23 Council.

24 Also, we have elections for judges
25 of international corporate justice. Countries

1 who have candidates, they lobby other countries
2 for their votes. And there are so many
3 elections at the United Nations, for seats in
4 the Social and Economic Councils, for seats in
5 the Human Rights Council.

6 So these candidates and their
7 Ambassadors would lobby others to get their
8 votes. These are meetings related to
9 candidates running for office at the UN. And
10 that is another key component of the work of
11 the United Nations.

12 Q. And so attending those meetings was
13 officially UN business; correct?

14 A. Yes.

15 Q. And you were attending in your
16 capacity as Permanent Observer; correct?

17 A. Absolutely.

18 Q. And what did you discuss with those
19 candidates?

20 A. Basically, they are lobbying us to
21 get our support, if we can vote, get our vote.
22 If we cannot vote, they know that we are
23 influential at the UN so that we can say good
24 things about them to those who have the
25 capacity to vote.

1 What do I discuss with their
2 members, let's say, who are running for seats
3 in the Security Council? That we are active in
4 the agenda of the Security Council. There is
5 discussions of issues related to us in the
6 Security Council, specifically, so then they
7 have to prove to me that they will be
8 objective, guided by the principles of the
9 charter, UN resolutions, international law,
10 when these issues are discussed in the Security
11 Council in order to get my approval and support
12 for them and their candidature -- in the
13 business of the UN.

14 Q. Did you ask any questions of the
15 candidates?

16 A. Most likely, yes, but I don't
17 recall. It's a general discussion, you know,
18 and these candidates, there are so many of
19 them, covering so many different issues from
20 the Security Council, Human Rights Council, so
21 many other positions.

22 Q. There is an entry on May 19, 2021
23 titled, interview with Morning Joe on MSNBC.
24 You were interviewed that day, you were
25 interviewed live on the Morning Joe program;

1 correct?

2 A. That is correct.

3 Q. As you might guess, we are going to
4 show you an interview, or a video, excuse me,
5 that we would like to mark as Exhibit 11. We
6 will show you an excerpt from the interview.

7 (Deposition Exhibit No. 11 was
8 marked for identification.)

9 (Video playing.)

10 BY MR. WICK:

11 Q. Dr. Mansour, do you recognize that
12 as an excerpt of a -- of your interview with
13 the Morning Joe program notated on your
14 calendar for May 19, 2021?

15 A. I do.

16 Q. And where were you when you gave
17 that interview?

18 A. In my office in the Observer Mission
19 of the State of Palestine to the United
20 Nations.

21 Q. Where you are sitting right now;
22 correct?

23 A. Correct.

24 Q. And you were speaking in that
25 interview to the American public; correct?

1 A. I was speaking to Joe and the lady
2 who is the co-anchor woman and through them, I
3 guess, to their audience.

4 Q. And was one of the purposes of
5 giving that interview to advocate for the
6 Palestinian cause?

7 A. The purpose of -- the main purpose
8 of that speech was to exert all efforts
9 possible to have a cease fire, stop the war
10 that was waging against the Palestinian people
11 in the occupied territory, particularly in the
12 Gaza Strip.

13 And that is -- was a discussion in
14 the Security Council at that time and
15 consultation with all members of the Security
16 Council, all members, including the P-5, in
17 order to bring about a cease fire as soon as
18 possible. That was the main objective of that
19 interview, which is, in my capacity as the
20 Permanent Observer of the State of Palestine to
21 the UN, is to do everything possible within the
22 Security Council, within the United Nations,
23 and the entire international community, to
24 bring a quick cease fire and put an end to that
25 tragedy to save lives.

July 08, 2021

1 Q. Next, May 22, 2021, there is an
2 entry for Al Jazeera interview. Do you see
3 that?

4 A. May what, 20?

5 Q. May 22, 2021?

6 A. I see it.

7 Q. Does that entry reflect you were
8 interviewed by Al Jazeera on that date?

9 A. Yes.

10 Q. I want to show you a video marked as
11 Exhibit 12.

12 (Deposition Exhibit No. 12 was
13 marked for identification.)

14 BY MR. WICK:

15 Q. Do you recognize Exhibit 12 as an
16 excerpt from a video of your interview with Al
17 Jazeera that's reflected in your calendar on
18 May 22, 2021?

19 A. That is correct.

20 Q. And where were you when you gave
21 that interview?

22 A. My office. In --

23 Q. In the Observer Mission?

24 A. Observer Mission of the State of
25 Palestine to the United Nations.

1 Q. Where you're sitting right now;
2 correct?

3 A. Correct.

4 Q. And was one of the purposes of
5 giving that interview to advocate for the
6 Palestinian cause?

7 A. The main purpose of that interview
8 is to show what was happening in the Security
9 Council in our efforts to have a cease fire,
10 immediate cease fire to the battle that was
11 waging at that time and to save lives of
12 civilians, particularly children in which 66 of
13 them were killed in the Gaza Strip during that
14 aggression.

15 Q. Then on May 25, 2021, there is an
16 entry, virtual farewell meeting with ICC
17 prosecutor.

18 Do you see that?

19 A. Yes.

20 Q. What was that event?

21 A. We are -- it is an event to say
22 goodbye to Madam Bensouda, who is the
23 prosecutor of the ICC, she finished and, you
24 know, members of the ICC and we are a state
25 party member and, in fact, we sit on the Bureau

1 of the ICC, to say goodbye to her and to thank
2 her for her work during that tenure.

3 Q. And was that meeting virtual, as the
4 entry suggests?

5 A. It was virtual.

6 Q. Where were you when you attended the
7 meeting?

8 A. I did not attend that meeting.

9 Q. Oh. Why is it on your calendar?

10 A. Because I was supposed to attend but
11 something came up. I sent one of my colleagues
12 to attend on my behalf.

13 Q. Who attended on your behalf?

14 A. Majed Bamyia.

15 Q. Did Mr. Bamyia speak at the event?

16 A. I don't really know.

17 Q. And what was the purpose of sending
18 somebody from the Observer Mission to attend?

19 A. Because he is the specialist that
20 handles, you know, legal issues including the
21 ICC.

22 Q. Why did you think it was appropriate
23 to have somebody from the Observer Mission
24 represent the State of Palestine at this event
25 as opposed to someone in Ramallah?

1 A. The ICC has different components to
2 its structure, including the General Assembly
3 of the ICC, which is composed of close to 128
4 countries. We are one of them. We are a full
5 member, a state party in the ICC.

6 The way they operate is they
7 alternate between New York or the Hague. And
8 most of the time in New York, because all of
9 the countries that are members of the ICC have
10 Ambassadors representing them here in -- and
11 when they need to elect the bureau, they do it
12 most of the times in New York, this is when we
13 were connected for the last two times
14 successively as a member of the bureau. It
15 doesn't happen in capitals. As I said, it
16 happens in New York or in the Hague because the
17 headquarter of the ICC is in the Hague,
18 Netherlands.

19 Q. So the reason for having somebody
20 from the Observer Mission attend was because it
21 would be more convenient to have somebody based
22 in New York to attend than somebody in
23 Ramallah?

24 A. And the person, my colleague is a
25 specialist from our side, on the ICC affairs,

1 so he would be -- if I do not go to attend, he
2 would be the appropriate person to go and
3 represent me, because he is very familiar with
4 the issues and the discussions including even
5 saying goodbye to the prosecutor.

6 Q. The reason for having somebody from
7 the Observer Mission attend this rather than
8 have somebody from Ramallah attend would be
9 because the Observer Mission is in New York and
10 the events are frequently in New York?

11 MR. BERGER: Objection. That
12 misstates his testimony. It's asked and
13 answered. I know you don't seem to like his
14 answer, but you have asked that question three
15 times.

16 MR. WICK: I'm afraid I don't
17 understand the answer. It's not about liking
18 or not liking. So I will not misstate his
19 testimony. I will ask the question again.

20 BY MR. WICK:

21 Q. What is the purpose of having
22 somebody from the Observer Mission attend this
23 event as opposed to somebody from Ramallah?

24 A. It is not that we are doing
25 something different than other countries do.

1 All other members of the ICC, they have their
2 Ambassadors at the -- or whomever the
3 Ambassador designates, from his Mission, attend
4 these meetings in New York.

5 So we do like everybody -- others
6 do. It is not the representative from the
7 capital that attend these meetings when they
8 take place in New York. It is the Ambassadors
9 in New York attend. When it happens in the
10 Hague, the Ambassador in the Hague attend.

11 If there is a conference at the
12 ministerial level for the ICC, then the
13 minister attends regardless of the location of
14 where the meeting takes place. This is how
15 this business is done.

16 Q. And is attending a farewell meeting
17 with the ICC prosecutor officially UN business
18 in your view?

19 A. Yes, it is.

20 Q. To the best of your recollection, on
21 this calendar today, are there any entries
22 concerning public activities, other than those
23 activities involving official UN business
24 undertaken on behalf of the Observer Mission
25 that are missing from this list?

1 A. To the best of my ability, there is
2 nothing missing from this list.

3 MR. WICK: I think we are -- I
4 think this is probably a good time for a lunch
5 break, but before we set that in motion, can we
6 just go off the record for a moment?

7 THE VIDEOGRAPHER: We are now
8 off the record. The time is 1637 UTC time.

9 (Discussion held off the
10 record.)

11 THE VIDEOGRAPHER: We are
12 back on the record. The time is 1640 UTC time.

13 MR. WICK: I think this is a
14 good time to break for lunch, and I guess I
15 would ask others involved, what do we need in
16 terms of time, given that we're virtual; is 45
17 minutes enough?

18 MR. BERGER: How long do you
19 anticipate you have for your remaining
20 questioning?

21 MR. WICK: Quite a bit.
22 Several hours.

23 MR. BERGER: Well, why don't
24 we take a full hour.

25 MR. WICK: Okay. Come back at

1 1:40?

2 MR. BERGER: Very good.

3 Thanks.

4 THE VIDEOGRAPHER: We are now
5 off the record. The time is 1641 UTC time.

6 (At 12:41 p.m., a lunch recess
7 was taken.)

8 THE VIDEOGRAPHER: We are
9 back on the record. The time is 1743 UTC time.

10 BY MR. WICK:

11 Q. Good afternoon, Dr. Mansour. I want
12 to go back to the Observer Mission building.
13 You indicated the Observer Mission owns that
14 building. To be clear, the Observer Mission
15 has owned that building at all times since
16 January 4, 2020; is that correct?

17 A. I am sorry, can you repeat the
18 question, please?

19 Q. Yes. The question is, has the
20 Observer Mission owned the Observer Mission
21 building at all times since January 4th of
22 2020?

23 A. That is correct.

24 Q. I'm going to return to Exhibit 2
25 from very early in the deposition. As I

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1 engaged in any activity intended to raise money
2 for the State of Palestine?

3 A. No.

4 Q. Are you aware of any fundraising
5 events that have taken place, after January 4th
6 of 2020, that were conducted on behalf of the
7 PLO or the PA?

8 A. I am not aware.

9 Q. Are you aware of any fundraising
10 events that have taken place after January 4th
11 of 2020 that were conducted on behalf of the
12 Observer Mission?

13 A. I am not aware.

14 Q. Are you aware of any fundraising
15 events that have taken place after January 4,
16 2020 that were conducted on behalf of the State
17 of Palestine?

18 MR. BERGER: I assume you mean
19 in the United States?

20 MR. WICK: Yes, thank you for
21 that clarification, Mr. Berger, in the United
22 States.

23 THE WITNESS: No.

24 BY MR. WICK:

25 Q. At any time after January 4th of

1 2020, has the Observer Mission provided members
2 of the Palestinian community in the United
3 States with assistance in getting documents
4 authenticated or notarized?

5 A. Can you repeat the last part of it?

6 Q. I will repeat the whole question to
7 be clear.

8 A. Okay.

9 Q. At any time after January 4th of
10 2020, has the Observer Mission provided members
11 of the Palestinian community in the United
12 States with assistance in getting documents
13 authenticated or notarized?

14 A. No.

15 Q. To your knowledge, has the PLO or
16 the PA or the State of Palestine provided such
17 assistance during that time period?

18 A. No.

19 Q. At any time after January 4th of
20 2020, has the Observer Mission maintained a
21 list of notaries that it recommends to
22 Palestinian-Americans?

23 A. No.

24 Q. To your knowledge, has the PLO
25 maintained such a list?

1 A. No.

2 Q. And to your knowledge, has the PA
3 maintained such a list?

4 A. I don't know.

5 Q. To your knowledge, has the State of
6 Palestine maintained such a list?

7 A. As far as I know, no.

8 Q. Are you familiar with the term
9 consular services?

10 A. Yes.

11 Q. What is your understanding of what
12 consular services are?

13 A. Consular services means with the
14 passport and certification of documents for
15 companies, individuals, and a host of things
16 known as consular services outside the
17 representation, like in our case, the UN or if
18 you have a bilateral relationship
19 representation to the country where you
20 represent --

21 Q. At any time after January 4th of
22 2020, has the Observer Mission provided
23 consular services in the United States?

24 A. No.

25 Q. To your knowledge, any time after

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1 is --

2 THE COURT REPORTER: I'm
3 sorry, Doctor, the what committee?

4 THE WITNESS: The first, the
5 No. 1 committee, which is the disarmament
6 committee, and he is active in the Security
7 Council affairs as part of our team.

8 He is also our lead representative
9 in all issues related to the ICC, in New York.
10 And he also has other responsibilities that I
11 designate.

12 BY MR. WICK:

13 Q. Does he have an office in the
14 Observer Mission building?

15 A. Yes.

16 Q. Next is Mr. Abou Shawesh. You
17 mentioned him a little bit earlier. What does
18 he do?

19 A. Abdallah Abou Shawesh is our lead
20 representative in the Second Committee. It is
21 one of the extremely busy committees at the
22 Unites Nations responsible for producing at
23 least 40 resolutions annually related to
24 economic development.

25 Remember, I referred to Friends of

1 Monterrey is one component. It deals with all
2 of the details of the SDGs, the sustainable
3 development goals and targets, and he is
4 also -- represent us on the Social and Economic
5 Council, on the economic part of the Social and
6 Economic Council, and as a -- I forgot to say
7 that, in the Second Committee, Third Committee
8 and Fourth Committee, and now in this case of
9 Abdallah, there are resolutions specific to the
10 question of Palestine, at least one resolution
11 in the case of Feda. In the Fourth Committee
12 there are eight or seven resolutions adopted
13 annually or biannually, and they are
14 responsible for negotiating and, you know,
15 operating these draft resolutions and
16 collecting sponsorships to put them to a vote.

17 Q. Next on the list is Sahar Abu
18 Shawesh?

19 A. Sahar Abu Shawesh is a key player
20 with Abdallah in the Second Committee division
21 of labor as to the term, all of that committee,
22 so she covers a number of these issues. One
23 example is realignment, the sub item that they
24 deal with in the Second Committee.

25 So she is extremely helpful and

1 often she leads a group of Ambassadors, on
2 behalf of the Group of 77 and China, to
3 negotiate with other group, the substance of a
4 resolution here and resolution there.

5 Q. And does she have an office in the
6 Observer Mission building?

7 A. Yes.

8 Q. And I neglected to ask, Abdallah
9 Abou Shawesh, does he have an office in the
10 Observer Mission building as well?

11 A. Yes.

12 Q. What about Nada Tarbush, I believe
13 you mentioned that she has left. What did she
14 do?

15 A. She followed mainly the Fifth
16 Committee because the Fifth Committee, during
17 our chairmanship of the Group of 77 and China
18 is extremely active committee, it deals with
19 the budget of the UN and the allocations of
20 money to different items, different committees
21 and resolutions that have financial
22 implications, and she used to help, you know,
23 with some issues related to the First Committee
24 and some issues and activities related to the
25 work of Fedra.

1 Q. Okay. And did she have an office in
2 the Observer Mission building?

3 A. When she was with us, she had an
4 office.

5 Q. And next is Sahar Khalil Salem, what
6 did he or she do?

7 A. She has responsibilities with some
8 experts in the Security Council because the way
9 the Security Council operates, you have
10 Ambassadors, you have the deputy Ambassadors,
11 you have the experts. Usually the experts,
12 they do a lot of the legwork in terms of
13 details of draft resolutions. They keep
14 sharing with each other details and information
15 of the files that they follow, in our case,
16 files related to the question of Palestine,
17 they cover so many areas, and she is active
18 with her colleagues, the experts.

19 In addition to that, she is taking
20 now larger responsibility in the Third
21 Committee after the departure of Nadya Rasheed.
22 She is mainly specialist on issues related to
23 children and children in conflict and she is,
24 you know, the liaison between me and the
25 special representative of the Security General

1 on children in armed conflict, and she also
2 represents us on the item -- questions or
3 issues of information in the Fourth Committee,
4 and other responsibilities that I ask of her.

5 Q. I'm sorry, I think I asked that
6 question in the past tense. Ms. Salem still
7 works for the Observer Mission; correct?

8 A. Yes.

9 Q. And she has an office in the
10 Observer Mission building?

11 A. Yes.

12 Q. The next is Nadia Ghannam, who we
13 talked about with respect to social media.

14 A. Yes.

15 Q. What else did she do?

16 A. She is our representative in a group
17 of Asia-Pacific grouping in the United Nations.
18 This group of countries is very important group
19 that deals with nominations of countries for
20 different posts and positions.

21 For example, when we ran to be the
22 chair of the Group 77 and China, we had to
23 submit our, you know, nomination to that group,
24 and we had to lobby in order to get a unanimous
25 endorsement of that group to be the candidate

1 to assume that post on behalf of that group
2 before it went to the Group of 77 and China for
3 endorsement and announcement in the General
4 Assembly, that the State of Palestine was, in
5 the year 2009, chair of the Group of 77 and
6 China, and she does other responsibilities I
7 ask her.

8 She has an office in the Mission.

9 Q. Okay. And next is Ghada Hassan
10 Abdelwahab. What does that individual do?

11 A. She is, you know, a financial
12 officer. She is responsible for, you know, the
13 payroll, the payment of all the bills around
14 our building, the automobile, the telephone
15 bills, everything of that nature, and the
16 preparing the regular reports to the finance
17 department.

18 And she is also our liaison officer
19 when the President or ministers come, usually
20 officers from the State Department contact us
21 through her about all the regulations that they
22 want from us about the arrival of dignitaries
23 and their safety and security.

24 Q. Okay. I believe that you told us
25 earlier that Mr. Alhantouli and Ms. Barghouti

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